

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE METHYL TERTIARY BUTYL ETHER  
PRODUCTS LIABILITY LITIGATION**

**This document relates to:**

*City of New York v. Amerada Hess Corporation, et al.,*  
No. 04 Civ. 3417 (SAS)

Master File No. 1:00-1898  
MDL 1358 (SAS)  
M21-88

**DECLARATION OF LAUREN HANDEL IN SUPPORT EXXON MOBIL  
DEFENDANTS' MOTION FOR A NEW TRIAL BASED ON ERRORS OF LAW**

Lauren Handel, an attorney duly admitted to practice law in the State of New York and in this Court, hereby declares under penalty of perjury:

1. I am an attorney with the law firm of McDermott Will & Emery LLP, counsel for the Exxon Mobil Defendants in the above-captioned matter. I submit this Declaration in support of the Exxon Mobil Defendants' Motion For A New Trial Based On Errors Of Law (hereinafter "Motion"). This Declaration authenticates the exhibit attached hereto and relied on in support of the Motion. In accordance with this Court's Individual Rules and Procedures, the exhibits have been excerpted to include only the relevant material. Copies of each of the exhibits appended hereto were made at my direction on or around April 21, 2010.

2. Attached hereto as Exhibit A is a true and correct copy of the Oct. 11, 2009, Letter from Peter Sacripanti to the Court.


3. Attached hereto as Exhibit B is a true and correct copy of Plaintiffs' Exhibit 14844.

4. Attached hereto as Exhibit C is a true and correct copy of Plaintiffs' Exhibit 14845.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts from the Expert Report of David W. Hand, Ph.D. (Mar. 9, 2009).
6. Attached hereto as Exhibit E is a true and correct copy of excerpts from the Expert Report of Dr. Sandra N. Mohr, MD, MPH (Mar. 9, 2009).
7. Attached hereto as Exhibit F is a true and correct copy of the Declaration of Kenneth M. Rudo in Support of Plaintiff City of New York's Motion for Leave to Designate Substitute Expert Witness (Aug. 13, 2009).
8. Attached hereto as Exhibit G is a true and correct copy of the Aug. 24, 2009, Letter from James Pardo to the Court.
9. Attached hereto as Exhibit H is a true and correct copy of the Aug. 20, 2009, Letter from N. Campins to Court.

Dated: New York, NY  
April 21, 2010

Respectfully submitted,

  
Lauren Handel